



**From:** Matthew Hardin matthewdhardin@gmail.com  
**Subject:** Public Records Act Request  
**Date:** May 10, 2025 at 11:12 AM  
**To:** kent@winnemuccalaw.com  
**Cc:** manager@winnemuccacity.org  
**Bcc:** Joshua Moon jcmoon@pm.me

Good morning,

Pursuant to the Nevada Public Records Act, I hereby request copies of any email correspondence in the custody of any member of the City Council, or any member of the City Manager's Office, or any member of the City's staff, which email correspondence:

- 1) Is to or from an individual named Russell Greer; and
- 2) Relates to Item # (F)(2) of the May 6, 2025 City Council Meeting, or to the topic of adult entertainment or prostitution; and
- 3) Is dated any time during calendar year 2025.

Pursuant to *Las Vegas Review Journal v. Clark County School District*, 134 Nev. Adv. Op. 84 (2018), I wish to inform the City that there is extensive public interest in the release of these documents. Specifically, Mr. Greer appears to be a prolific advocate for prostitution in rural communities across Nevada and elsewhere, and is also a prolific litigant in the federal and state courts on topics both related and unrelated to prostitution. Mr. Greer is also documented to have a misdemeanor conviction arising from inappropriate behavior towards one woman in Utah, and has been the subject of at least three separate personal protection or restraining orders, all of which arise from further allegations of unlawful behavior towards women. Additionally, Mr. Greer appears to have made representations to the U.S. District Court for the District of Utah on May 2, 2025 that he could not attend a virtual hearing scheduled in that Court on May 6, 2025 because the Winnemucca meeting was an "emergency" of which he did not have advance notice.

Public records you might release in response to this request will shed light not only on Mr. Greer's broader advocacy for the expansion of prostitution and his behavior towards women, but will also shed light on the extent to which Mr. Greer has been honest or dishonest to the federal court in Utah. Specifically, the date on which Mr. Greer was informed that the Winnemucca City Council would hear his request on May 6, 2025 is relevant, because if Mr. Greer had notice at any time prior to May 2, 2025 that he would appear at the Winnemucca City Council meeting, that would indicate Mr. Greer was dishonest in his representations to the court that the Winnemucca meeting was an "emergency."

Thank you for your prompt attention to this request. Please let me know if you need any further information from me to facilitate your search for records or to evaluate the extent of the public interest in their release.

**Matthew D. Hardin**

**Hardin Law Office**

Direct Dial: 202-802-1948

NYC Office: 212-680-4938

Email: MatthewDHardin@protonmail.com